

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE PERIOD
MARCH 1, 2022 THROUGH APRIL 12, 2022**

Debtor: LTL Management LLC Applicant: Cooley LLP
Case No.: 21-30589 (MBK) Client: Official Committee of Talc Claimants II
Chapter: 11 Case Filed: October 14, 2021

**SECTION 1
FEE SUMMARY**

☒ Monthly Fee Application No. 3 or ☐ Interim Fee Application No. or ☐ Final Fee Application

Summary of Amounts Requested for the Period from March 1, 2022 through April 12, 2022 (the “Third Statement Period”) by the Official Committee of Talc Claimants II (“TCC II”):

Total Fees:	\$2,883,780.00
Total Disbursements:	\$140,562.44
Minus 20% Holdback of Fees:	(\$576,756.00)
Total Amount Sought To Be Paid At This Time:	\$2,447,586.44

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
1. Heidi A. Lawson, Partner	1997	61.6	\$1,420	\$87,472.00
2. Cathy Rae Herschopf, Partner	1989	27.6	\$1,420	\$39,192.00
3. Jason L. Kent, Partner	1998	0.7	\$1,360	\$952.00
4. Kathleen R. Hartnett, Partner	2003	49.9	\$1,340	\$66,866.00
5. Matthew Kutcher, Partner	2001	37.8	\$1,340	\$50,652.00
6. Ian Ross Shapiro, Partner	2001	103.7	\$1,305	\$135,328.50
7. Russell Capone, Partner	2006	20.0	\$1,285	\$25,700.00
8. Cullen D. Speckhart, Partner	2009	193.5	\$1,225	\$237,037.50
9. Shamis Beckley, Partner	2012	85.3	\$1,215	\$103,639.50
10. Michael Klein, Partner	2005	89.0	\$1,180	\$105,020.00
11. Nicholas A. Flath, Special Counsel	2012	176.4	\$1,170	\$206,388.00

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
12. Samuel Tacey, Special Counsel	2007	28.6	\$1,170	\$33,462.00
13. Reed A. Smith, Special Counsel	1999	60.7	\$1,165	\$70,715.50
14. Erica J. Richards, Special Counsel	2007	74.3	\$1,165	\$86,559.50
15. David H. Kupfer, Associate	2011	39.8	\$1,155	\$45,969.00
16. Lauren A. Reichardt, Associate	2015	144.4	\$1,155	\$166,782.00
17. Summer M. McKee, Associate	2015	77.9	\$1,155	\$89,974.50
18. Robert W. Jacques, Associate	2013	114.5	\$1,155	\$132,247.50
19. Patrick J. Hayden, Associate	2015	6.6	\$1,155	\$7,623.00
20. Elizabeth A. Trafton, Associate	2015	31.9	\$1,140	\$36,366.00
21. Evan M. Lazerowitz, Associate	2013	278.1	\$1,140	\$317,034.00
22. Rachel F. Katz, Associate	2016	91.0	\$1,140	\$103,740.00
23. Julie M. Veroff, Associate	2016	31.1	\$1,140	\$35,454.00
24. Joseph W. Brown, Associate	2017	79.3	\$1,115	\$88,419.50
25. Amanda L. Liverzani, Associate	2017	8.9	\$1,115	\$9,923.50
26. Paul J. Springer, Associate	2016	62.0	\$1,115	\$69,130.00
27. Olya Antle, Associate	2012	25.7	\$1,115	\$28,655.50
28. Jared R. Kasner, Associate	2015	52.4	\$1,000	\$52,400.00
29. Weiru Fang, Associate	2019	77.1	\$920	\$70,932.00
30. Jeremiah P. Ledwidge, Associate	2018	174.5	\$920	\$160,540.00
31. Drew Wegner, Associate	2020	67.9	\$820	\$55,678.00
32. Lauren E. Fowler, Associate	2021	40.3	\$720	\$29,016.00
33. Hanna C. Evensen, Associate	2021	1.7	\$720	\$1,224.00
34. Rachel H. Alpert, Associate	2021	11.9	\$620	\$7,378.00
35. Kimberley A. Bishop, Associate	2021	43.0	\$620	\$26,660.00
36. Joyce V. Rodriguez-Luna, Law Clerk	N/A	5.4	\$610	\$3,348.00
37. Cristina A. Lombardi, Law Clerk	N/A	11.3	\$610	\$7,006.00
38. Erin L. Combs, Paralegal	N/A	27.5	\$415	\$11,412.50
39. Veronica Rusu, Paralegal	N/A	86.9	\$395	\$34,325.50

NAME OF PROFESSIONAL & TITLE	YEAR ADMITTED (Or Years of Professional Service)	HOURS	RATE	FEE
40. Mollie N. Canby, Paralegal	N/A	29.4	\$380	\$11,172.00
41. Denise Cahir, Paralegal	N/A	82.5	\$350	\$28,875.00
42. Heather R. Ford, Paralegal	N/A	3.6	\$215	\$774.00
43. Dmitry Spektor, Lit-E-Discovery Svcs.	N/A	1.9	\$385	\$731.50
44. Lisa D. MacDonald, Information/Research Svcs.	N/A	0.3	\$345	\$103.50
45. Zach Kerns, Information/Research Svcs.	N/A	0.8	\$345	\$276.00
46. Maribel H. Nash, Information/Research Svcs.	N/A	1.4	\$345	\$483.00
47. Kimball Fontein, Information/Research Svcs.	N/A	0.6	\$345	\$207.00
48. Rafael Sanchez, Information/Research Svcs.	N/A	1.0	\$345	\$345.00
49. Donny Kong, Senior Docket Analyst	N/A	2.0	\$295	\$590.00

Fee Totals:	<u>\$2,883,780.00</u>
Disbursements Totals:	<u>\$140,562.44</u>
Total Fee Application:	<u>\$3,024,342.44</u>
Amount Sought at this Time:	<u>\$2,447,586.44</u>

**SECTION II
SUMMARY OF SERVICES**

SERVICES RENDERED	HOURS	FEE
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	402.7	\$397,701.00
b) Asset Disposition Sales, leases, abandonment and related transaction work.	0.0	\$0.00
c) Avoidance Action Litigation Preference and fraudulent transfer litigation.	0.0	\$0.00
d) Business Operations Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	2.7	\$2,904.00
e) Case Administration Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	206.2	\$197,923.50
f) Claims Administration and Objections Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	854.7	\$941,909.00
g) Employee Benefits/Pensions Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0.0	\$0.00
h) Fee/Employment Applications Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	127.9	\$112,247.50
i) Fee/Employment Objections Review of an objections to the employment and fee applications of others.	11.4	\$11,675.00
j) Financing Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0.0	\$0.00
k) Litigation Other than Avoidance Action Litigation	564.7	\$568,911.50
l) Meetings Preparing for and attending meetings. ¹	275.7	\$324,643.50
m) Plan and Disclosure Statement Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	28.7	\$33,829.00

¹ Included in this category is all time spent on meetings. \$120,698.50 of fees were incurred preparing for and attending conferences and meetings with TCC II members and/or their representatives. \$203,945.50 of fees were incurred preparing for and attending other meetings.

SERVICES RENDERED	HOURS	FEE
n) Relief from Stay Proceedings Matters relating to termination or continuation of automatic stay under 362.	6.9	\$6,982.50
o) Accounting/Auditing Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0.0	\$0.00
p) Business Analysis Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0.0	\$0.00
q) Corporate Finance Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0.0	\$0.00
r) Data Analysis Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0.0	\$0.00
s) Litigation Consulting Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0.0	\$0.00
t) Reconstruction Accounting Reconstructing books and records from past transactions and brining accounting current.	0.0	\$0.00
u) Tax Issues Analysis of tax issues and preparation of state and federal tax returns.	0.0	\$0.00
v) Valuation Appraise or review appraisals of assets.	0.0	\$0.00
w) Travel Time (billed at 50%)	6.9	\$6,982.50
x) Hearings Preparation for and attendance at hearings.	235.4	\$276,752.50
SERVICE TOTALS:	2,723.7	\$2,883,780.00

**SECTION III
SUMMARY OF DISBURSEMENTS**

DISBURSEMENTS	AMOUNT
a) Filing Fees Payable to Clerk of Court.	\$241.50
b) Computer Assisted Legal Research Westlaw, Lexis and a description of manner calculated.	\$21,917.60
c) Pacer Fees Payable to the Pacer Service Center for search and/or print.	\$0.00
d) Fax Include per page fee charged.	\$0.00
e) Case Specific Telephone/Conference Call Charges Exclusive of overhead charges.	\$0.00
f) In-house Reproduction Services Exclusive of overhead charges.	\$0.00
g) Outside Reproduction Services Including scanning services. This includes trial preparation.	\$8,318.74
h) Other Research Title searches, UCC searches, Asset searches, Accurint.	\$0.00
i) Court Reporting (including depositions) Transcripts.	\$36,367.45
j) Travel Mileage, tolls, airfare, parking.	\$12,854.47
k) Courier & Express Carriers (FedEx) Overnight and personal delivery.	\$637.93
l) Postage	\$0.00
m) Meals	\$9,903.10
n) Miscellaneous	\$6,494.51
o) Additional Services	\$1,206.23
p) Professional Services	\$0.00
q) Supplies	\$303.13
r) Document Preparation	\$17.74
s) Hotels	\$42,300.04
DISBURSEMENTS TOTAL:	\$140,562.44

I certify under penalty of perjury that the above is true.

Date: April 29, 2022

/s/ Cullen D. Speckhart

Cullen D. Speckhart